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May 7, 2024

VIA E-MAIL

Hon. Margaret M. Garnett
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Kelly Toys Holdings, LLC v. 880925 Store, et al., Case No. 22-cv-3737*
("Case I")
Kelly Toys Holdings, LLC v. Chang Sha Zhuo Qian Dian Zi Ke Ji You Xian
Gong Si, Case No. 22-cv-3739 ("Case II")
Letter Request to Reschedule DJ Hearings

Dear Judge Garnett,

We represent Kelly Toys Holdings, LLC ("Plaintiff"), in the above-referenced related matters (the "Actions").¹ On March 8, 2024, Plaintiff filed its motions for default judgment in the Actions. (Case I, Dkts. 30-33; Case II, Dkts. 65-68). On March 12, 2024, the Court entered an Order setting a default judgment briefing schedule, which, *inter alia*, scheduled a default judgment hearing ("DJ Hearings") for May 2, 2024 at 2:30 p.m. (Case I, Dkt. 35; Case II, Dkt. 70). Thereafter, on April 21, 2024, the Court entered an Order adjourning the DJ Hearings to May 16, 2024 at 2:30 p.m. (Case I, Dkt. 37; Case II, Dkt. 72). For the reasons set forth herein, Plaintiff respectfully submits the instant letter requesting to reschedule the DJ Hearings.

1. **Reason for the Proposed Adjournment:** Plaintiff's counsel will be appearing before Your Honor on for a default judgment hearing on Tuesday, May 14, 2024 at 2:00 p.m. in a different matter, *Telebrands Corp. v. Aleta Co. Ltd. et al.*, Case No. 23-cv-3351 ("Telebrands Matter"), and respectfully requests to reschedule the DJ Hearings to the same time to conserve judicial resources and because the lead associate on the Actions has a conflict on Thursday, May 16, 2024, the day of the currently scheduled DJ Hearings. Moreover, since the DJ Hearing is at the default judgment stage, Plaintiff's counsel does not anticipate that any Defaulting Defendants will appear, moreover, to the extent this Court grant's Plaintiff's instant request, Plaintiff will promptly serve any order rescheduling the DJ Hearings on Defaulting Defendants.
2. **Original Date:** The original date for the DJ Hearings is May 16, 2024 at 2:30 p.m.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff's Complaint or Application.

Hon. Margaret M. Garnett

May 7, 2024

Page 2 of 2

3. **Number of Previous Requests for Adjournment:** None, this is Plaintiff's first request for an adjournment of the DJ Hearings.
4. **Whether the Other Parties Consent:** All Defendants remaining in the Actions are currently in default, therefore Plaintiff did not seek their consent.
5. **Proposed Alternative Dates:** Plaintiff respectfully proposes Tuesday, May 14, 2024 at 2:00 p.m., the same time that Plaintiff's counsel is before Your Honor for the Telebrands Matter, May 21, 2024 or May 22, 2024, or another time that is convenient for the Court.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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GRANTED. The default judgment hearing is hereby ADJOURNED to **May 14, 2024 at 2:00p.m.**

SO ORDERED. Dated May 8, 2024.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE